National Environmental Achievement Track

Application Form

LSI Logic Corporation
_____
Name of facility

_____
Name of parent company (if any)

23400 NE Glisan
_____
Street address

_____
Street address (continued)

Gresham, OR 97030
_____
City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Morgan Rider

Title Environmental Engineer

Phone 503.618.4755

Fax 503.618.4560

E-mail mrider@lsil.com

Why do we need this information?
EPA needs background information on your facility to evaluate your application.

What do you need to do?
- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

LSI Logic is a leading supplier of application specific integrated circuits (ASICs) for the communication, consumer, and computer markets. High performance semiconductors are manufactured and tested at LSI Logic's Gresham site.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3674

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes   ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☒ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?　☒ Yes　☐ No

If yes, list in the right-hand column.

Hazardous Waste Generator ID: ORQ000004382
TRI Facility ID: 97030LSLGC23400

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Please see attached Attachment A.

Why do we need this information?
Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?
- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

    a. Environmental policy   ☒ Yes

    b. Planning   ☒ Yes

    c. Implementation and operation   ☒ Yes

    d. Checking and corrective action   ☒ Yes

    e. Management review   ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?   ☒ Yes

3 Did this cycle include both an EMS and a compliance audit?   ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?   ☒ Yes

    If yes, what method of EMS assessment did you use?

☐ Self-assessment

    ☐ GEMI   ☐ Other

    ☐ CEMP

☒ Third-party assessment

    ☒ ISO 14001 Certification

    ☐ Other

Why do we need this information?
Facilities must show that they are committed to improving their environmental performance. This mec that you can describe past achievements and will mc future commitments.

What do you need to do?
Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Materials Use	1.4	wafer units	0.53	wafer units

i. How is the current level an improvement over the previous level?

The volume of hazardous material required to manufacture our product has been reduced by 62%. Operational improvements, dilute chemistries, decreased bath changes and process step elimination have reduced the volume of hydrogen peroxide, ammonium hydroxide, hydrochloric acid, and solvents by over 37.000 gallons.

ii. How did you achieve this improvement?

All employees have an individual goal "To improve environmental performance." Each employee's performance evaluation considers their contribution towards improving environmental performance. The systematic evaluation of process improvements, which may result in resource reduction is driven by our Quality Improvement System and individual goals for performance improvement.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Water Use	92.2	wafer units	18.92	wafer units

i. How is the current level an improvement over the previous level?

Although a significant reduction in water consumption can be attributed to increased process efficiency due to increased production rates, additional process changes and identification of recycling opportunities have contributed to the aspect improvement.

ii. How did you achieve this improvement?

As part of our EMS and our commitment to environmental improvement, we have conducted evaluations of processes and equipment to optimize resource utilization. For example, a clean waste condensate was identified and rerouted back to the deionized water system. Additionally, process modifications have been implemented resulting in less water consumption

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Hazardous Materials Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of units of production or output

0.53 wafer units
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

25% reduction
(Quantity/Units)

e. How will you achieve this improvement?

Continued improvement in process optimization and evaluation of alternate materials will ensure ongoing reductions of hazardous materials use.

Second aspect you've selected

a. What is the aspect?

Total Water Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

300.000 gallons per day
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

80% Reclaim
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

LSI Logic is currently preparing to conduct a pilot test of treatment systems that will reclaim up to 80% of our wastewater back to the front of the facility. If the technology is feasible, the system will be designed and constructed by December 2001. This will effectively reduce our not only our overall water consumption, but also our wastewater discharge.

Third aspect you've selected

a. What is the aspect?

Total solid waste

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value   21.8 tons per month
(Quantity/Units)

☐ Option B:
In terms of
units of production   (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value   Goal to recycle 50% of
                   solid waste

☐ Option B:
In terms of   (Quantity/Units)
units of production
or output   (Quantity/Units)

e. How will you achieve this improvement?

LSI Logic has a group of volunteer employees, known as the Green Team, who focus on minimizing the facility's environmental impact. The Green Team's primary focus is solid waste. The Green Team meets monthly to review ideas and projects to improve environmental performance. Since all employees have the goal to improve environmental performace, we achieve continuous environmental improvement.

Fourth aspect you've selected

a. What is the aspect?

Emissions of Greenhouse Gases

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

      (Quantity/Units)

☒ Option B:
In terms of   11 units/year
units of production   (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

      (Quantity/Units)

☒ Option B:
In terms of   90% reduction
units of production   (Quantity/Units)
or output

e. How will you achieve this improvement?

In 1996, LSI Logic signed the Memorandum of Understanding with EPA to reduce PFC emissions. In Gresham, we purchased over 40 thermal processing units (TPUs) for PFC destruction. Once the TPUs are facilitized, we will achieve a 90% reduction in PFC emissions. We will also continue to evaluate process changes that will reduce the use of PFCs and global warming potential.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

LSI Logic posts environmental information on our corporate worldwide web-site (www.lsilogic.com). Additionally, we have held open houses and public meetings to provide a forum for addressing environmental concerns. All inquiries are logged and responses are tracked.

2 How do you inform community members of important matters that affect them?

To inform the public of important matters that affect them, we have identified key stakeholders and community leaders, and sent mass mailings. The mailings provide information and have included invitations to attend an open house or public meeting.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.lsilogic.com

☐ Newspaper

☐ Open Houses

☒ Other

As part of the Oregon Green Permits program and Multnomah County Strategic Investment Program, we prepare an annual report on our environmental performance that is a publicly available document. This report contains environmental acheivements, and compliance information.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Columbia Slough Watershed Council	Jay Mower	503.281.1132
State/Local Regulator	Oregon Department of Environmental Quality	Marianne Fitzgerald	503.229.5946
Other community/local reference	Board of County Commissioners, Multnomah County Oregon	Chair Beverly Stein	503.248.3308

On behalf of LSI Logic - Gresham Campus
[my facility],
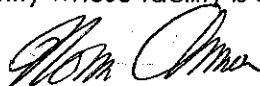
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions;*

- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date *[signature]* 8/16/00

Printed Name/Title Norm Armour, Vice President and General Manager of Gresham Operations

Facility Name LSI Logic Corporation

Facility Street Address 23400 NE Glisan

Facility ID Numbers Hazardous Waste Generator ID: ORQ000004382
TRI Facility ID: 97030LSLGC23400

Attachment A

Section A, Question 8 (optional)
Is there anything else you would like to tell us about your facility?

LSI Logic is a world leader in the design, production and sale of advanced custom semiconductors. In 1997, we completed construction of our premier manufacturing site in Gresham, Oregon. Based on the historical environmental achievements of LSI Logic, and our commitment to go beyond regulatory compliance for environmental protection, we would be an ideal National Environmental Achievement Track facility.

We achieved **ISO 14001 registration** in June 2000, and have been one of the three pilot facilities for the **Oregon Green Permits** Program since spring 1998. Through this pilot project, LSI Logic helped the DEQ develop and refine the Green Permits rules and guidance. We anticipate receiving one of the first Green Permits in September 2000.

As part of the development of the site, LSI Logic signed Strategic Investment Program (SIP) contract with Multnomah County. One of the provisions of this contract is to minimize the environmental impact from the manufacturing operations. To demonstration our fulfillment of the agreement, LSI Logic submits annual progress reports on our environmental performance to Multnomah County. The Oregon Department of Environmental Quality (DEQ) is involved with the review of our annual SIP report to demonstrate continuous environmental improvement.

In 1999, LSI Logic established a new corporate-wide performance evaluation process which links individual performance directly to strategic, organization, and functional business goals. Key Responsibilities (KRs) are defined to describe the main mission and responsibilities of each work group. KR goals are established by individuals for their specific job function to meet the overall KRs for the site. Everyone's performance evaluation is based on their achievement of the KR goals.

In Gresham, all employees have a KR goal to *Improve Environmental Performance.* The target of the EMS is that each department must complete one Environmental Improvement Project evaluation annually. Employees are evaluated during their performance review on their contribution toward achieving this goal.

LSI Logic also participates in the voluntary Waste Wise and Climate Wise programs. In 1996, we signed the Memorandum of Understanding with EPA for reduction of perfluorocompounds (PFCs). We have committed to a 10% reduction in PFC emissions by 2010, based on 1995 emissions. We prepare annual reports for these voluntary programs.

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about your facility," Question 6.* The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility. .

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: LSI Logic Corporation

Facility Location: Gresham, Oregon

Facility ID Number(s):   Hazardous Waste Generator I.D.:   ORQ000004382
(attach additional sheets if necessary)   TRI Facility I.D.:   97030LSLGC23400

Air Pollution Regulations

Check All That Apply

1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☐
2.	Permits and Registration of Air Pollution Sources	☒
3.	General Emission Standards, Prohibitions and Restrictions	☒
4.	Control of Incinerators	☐
5.	Process Industry Emission Standards	☐
6.	Control of Fuel Burning Equipment	☒
7.	Control of VOCs	☒
8.	Sampling, Testing and Reporting	☒
9.	Visible Emissions Standards	☒
10.	Control of Fugitive Dust	☒
11.	Toxic Air Pollutants Control	☒
12.	Vehicle Emissions Inspections and Testing	☐

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above *(identify)*

13.	_____	☐
14.	_____	☐

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261) ☒
   - Characteristic Waste ☒
   - Listed Waste ☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) ☒
   - Manifesting ☒
   - Pre-transport requirements ☒
   - Record keeping/reporting ☒
3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263) ☐
   - Transfer facility requirements ☐
   - Manifest system and record-keeping ☐
   - Hazardous waste discharges ☐
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264) ☐
   - General facility standards ☐
   - Preparedness and prevention ☐
   - Contingency plan and emergency procedures ☐
   - Manifest system, Record keeping and reporting ☐
   - Groundwater protection ☐
   - Financial requirements ☐
   - Use and management of containers ☐
   - Tanks ☐
   - Waste piles ☐
   - Land treatment ☐
   - Incinerators ☐
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
6. Interim Standards for Owners and Operators of New Hazardous Waste
   Land Disposal Facilities (40 CFR 267) ☐
7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above *(identify)*

8. _____ ☐

9. _____ ☐

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
2. Designation of Reportable Quantities and Notification of Hazardous
   Materials Spill (40 CFR 302) ☒
3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above *(identify)*

6. _____   ☐

7. _____   ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities
   and Practices (40 CFR 257)   ☐
2. Permit Requirements for Solid Waste Disposal Facilities   ☐
3. Installation of Systems of Refuse Disposal   ☐
4. Solid Waste Storage and Removal Requirements   ☐
5. Disposal Requirements for Special Wastes   ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above *(identify)*

6. _____   ☐

7. _____   ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)   ☒
2. Designation of Hazardous Substances (40 CFR 116)   ☒
3. Determination of Reportable Quantities for Hazardous Substances
    (40 CFR 117)   ☒
4. NPDES Permit Requirements (40 CFR 122)   ☐
5. Toxic Pollutant Effluent Standards (40 CFR 129)   ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)   ☒
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines
    and Standards (40 CFR 414)   ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines
    and Standards (40 CFR 415)   ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards
    (40 CFR 416)   ☐
10. Water Quality Standards   ☐
11. Effluent Limitations for Direct Dischargers   ☐
12. Permit Monitoring/Reporting Requirements   ☒
13. Classifications and Certifications of Operators and Superintendents
    of Industrial Wastewater Plants   ☐
14. Collection, Handling, Processing of Sewage Sludge   ☐
15. Oil Discharge Containment, Control and Cleanup   ☐
16. Standards Applicable to Indirect Discharges (Pretreatment)   ☒

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above *(identify)*

17. _____   ☐

18. _____   ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria and Standards
   (40 CFR 144, 146)   ☐
2. National Primary Drinking Water Standards (40 CFR 141)   ☐
3. Community Water Systems, Monitoring and Reporting Requirements
   (40 CFR 141)   ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or
   Subsurface Sources   ☐
5. Underground Injection Control Requirements   ☐
6. Monitoring, Reporting and Record keeping Requirements for Community
   Water Systems   ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above *(identify)*

7. _____   ☐

8. _____   ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting
   Requirements (40 CFR 704)   ☐
2. Import and Export of Chemicals (40 CFR 707)   ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)   ☐
4. Chemical Information Rules (40 CFR 712)   ☐
5. Health and Safety Data Reporting (40 CFR 716)   ☐
6. Pre-Manufacture Notifications (40 CFR 720)   ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761)   ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)   ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)   ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above *(identify)*

10. _____   ☐

11. _____   ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers
   (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above *(identify)*

9. _____ ☐

10. _____ ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability
   Act (Superfund) *(identify)*

   _____ ☐

   _____ ☐

2. RCRA Corrective Action *(identify)*

   _____ ☐

   _____ ☐

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above *(identify)*

3. _____ ☐

4. _____ ☐